IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
AND WELFARE FUNDS,)
DI :)
Plaintiff,)
) No. 08 C 516
V.)
) Judge Bucklo
)
PORTER CARTAGE, INC.) Magistrate Judge Ashman
an Illinois corporation not in good standing, and)
ROB PORTER, Individually)
·	
Defendants.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS

OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its

attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move

for entry of a default judgment in sum certain as stated in this Complaint and the supporting

Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

- 1. Suit was filed on January 24, 2008 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
- 2. Corporate service was made upon PORTER CARTAGE, INC., an Illinois corporation on February 16, 2008 and a copy of the proof of service was filed with the court on February 18, 2008.
- 3. Service was made upon ROB PORTER, Individually on February 16, 2008 and a copy of the proof of service was filed with the court on February 18, 2008.

4. Defendants are now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$4,745.28 Pension \$2,678.72 Welfare \$925.00 Attorneys fees \$444.00 Court costs \$8,793.00

WHEREFORE, Plaintiff prays for the entry of judgment against Defendants, PORTER CARTAGE, INC., an Illinois corporation and ROB PORTER, Individually, jointly and severally, and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$8,793.00.

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS

By:

One of Its Attorneys

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